

# **Exhibit 60**

STATE OF TEXAS, ET AL. vs. UNITED STATES OF AMERICA, ET AL.  
Roberto G. Gonzales, Ph.D. on 06/27/2018

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF TEXAS  
3 BROWNSVILLE DIVISION  
4 STATE OF TEXAS, et al.,  
5 Plaintiffs,  
6 vs. CASE NO. 1:18-cv-00068  
7 UNITED STATES OF AMERICA, et al.,  
8 Defendants,  
9 and  
10 KARLA PEREZ, et al.,  
11 Defendant-Intervenors.

12 -----x

13  
14 DEPOSITION OF  
15 ROBERTO G. GONZALES, PH.D.  
16 Wednesday, June 27, 2018  
17 1:04 p.m.  
18 Regus Business Center  
19 101 Federal Street  
20 Boston, Massachusetts 02110

21  
22 Laurie K. Langer, RPR  
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24  
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1 APPEARANCES

2

3 ON BEHALF OF THE PLAINTIFF(s):

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12 ON BEHALF OF THE DEFENDANT(s): United States of America

13 BY: James Walker, Esq.

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1 (Appearances continued.)

2

3 ON BEHALF OF THE DEFENDANT-INTERVENOR(s) :

4 BY: Jeremy E. Hollander, Esq.

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1 hardship for many of them to go back to their countries  
2 of origin.

3 And I think what's more, many of them don't have  
4 the connections, the kind of social capital that allows,  
5 allows people, would allow them in this country to be  
6 successful in kind of entering a job market and trying  
7 to kind of move along, move up, up the ladder in a  
8 career in any given career.

9 Q. But the likelihood of somebody leaving the United  
10 States if DACA were rescinded is not something you're  
11 offering an opinion about in this case?

12 A. That's correct.

13 Q. It sounds like from your prior work that it  
14 seemed like your testimony is that it's unlikely that  
15 somebody would leave the country if their DACA status  
16 were rescinded; is that fair?

17 A. Yeah.

18 Q. It's certainly possible somebody might; is that  
19 right?

20 A. It is possible. There are, I think, upwards of  
21 500,000 Mexican born and U.S. born children in Mexico.  
22 So it's a possibility and people will, I think the  
23 people will do what -- people will follow family  
24 members, for example.

25 Q. And in certain instances that may include leaving

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1 COMMONWEALTH OF MASSACHUSETTS)

2 SUFFOLK, ss. )

3

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5 I, Laurie Langer, Professional Reporter and  
6 Notary Public in and for the Commonwealth of  
7 Massachusetts do hereby certify that there came before  
8 me on the 27th day of June, 2018, at 1:04 o'clock p.m.  
9 the person hereinbefore named, Roberto Gonzales, who was  
10 by me duly sworn to testify to the truth and nothing but  
11 the truth of his knowledge touching and concerning the  
12 matters in controversy in this cause; that he was  
13 thereupon examined upon his oath, and his examination  
14 reduced to typewriting under my direction; and that the  
15 deposition is a true record of the testimony given by  
16 the witness.

11

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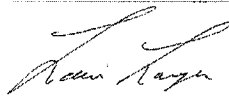
13 I further certify that I am neither attorney or  
14 counsel for, nor related to or employed by, any of the  
15 parties to the action in which this deposition is taken,  
16 and further that I am not a relative or employee of any  
17 attorney or counsel employed by the parties hereto or  
18 financially interested in the action.

16

17 In witness whereof, I have hereunto set my hand  
18 and seal this 29th day of June, 2018.

18

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NOTARY PUBLIC  
Commission Expires  
7/27/23

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